

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
No. 1:23-cv-00020-WR-WCM

CLARA M. MANN,

Plaintiff,

v.

TRAILS CAROLINA, LLC,

Defendant.

**NOTICE OF SETTLEMENT AND
JOINT MOTION TO STAY**

The parties, through their undersigned counsel, together notify the court that on February 22, 2024 they agreed to the material terms of a confidential settlement in this action. However, the parties require additional time to consummate that settlement. Therefore, the parties respectfully request that the court enter an order staying this action for thirty (30) days, during which the parties anticipate consummating their settlement and filing a stipulation of dismissal with prejudice pursuant to Fed. R. Civ. P. Rule 41(a)(1)(A)(ii).

Respectfully submitted by the Parties on February 22, 2024:

/s/ Shaun C. Blake

Shaun C. Blake (NC Bar #35819)
Jenkins M. Mann (*admitted pro hac*)
Rogers Lewis Jackson & Mann, LLC
1901 Main Street, Suite 1200
Columbia, SC 29201
Phone: (803) 256-1268
Fax: (803) 252-3653
Email: sblake@rogerslewis.com
jmann@rogerslewis.com

/s/ David L. Levy

David L. Levy (NC Bar #34060)
Kristy M. D'Ambrosio (NC Bar #52817)
Hedrick Gardner Kincheloe & Garofolo, LLP
4201 Congress Street, Suite 300
Charlotte, NC 28209
Phone: 704-336-1101
Fax: 704-336-6181
Email: dlevy@hedrickgardner.com
kdambrosio@hedrickgardner.com

ATTORNEYS FOR PLAINTIFF

ATTORNEYS FOR DEFENDANT